

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SCOTT SEDORE, #210661,

Plaintiff,

v.

Landfair, et al.,

Defendant.

Case No. 2:22-CV-10060

Honorable Gershwin A. Drain
United States District Judge

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PLAINTIFF'S SCOTT SEDORE
PROPOSED
VOIR DIRE QUESTION

Plaintiff proposed in requests the following voir dire questions be asked of prospective jurors.

I. General Background Questions

1. Have each juror stand and tell the court
 - a. Name.
 - b. Marital status.
 - c. Community in which you reside.
 - d. Community in which you grew up.
 - e. Present occupation and name of employer.
 - f. If retired, former employer.
 - g. Spouse's occupation and employer.
 - h. Ages of children, if any.
 - i. Education.
 - j. Membership in civic or political clubs or organizations.
 - k. News sources you regularly utilize.
2. Have you ever served on a jury before? If yes:

- Was it a civil or criminal case?
 - Did the jury reach a verdict?
 - Is there anything about your experience that would make it difficult for you to be fair in this case?
3. Have you or a member of your family ever been a party to a lawsuit either as a Plaintiff or Defendant? If the answer is yes, please state the date, type of case.
- Would this experience effect your ability to render a verdict in this case?
4. Have you or a close family member ever worked in law enforcement, corrections, or a prison system?
- If yes, what was the role?
 - Did this experience leave you with any strong feelings about prisoners that may affect your ability to be fair?
5. Do you or any close family members work in the medical field, particularly in a **prison, jail, or detention center**?
- If yes, what is your opinion on how prisoners receive medical care?
 - Do you believe prisoners deserve the same standard of medical care as people outside of prison?

6. The Defendants in this case are employees of the Michigan Department of Corrections (MDOC). Do any of you harbor ill feelings toward the Michigan Department of Corrections or any of its employees?
 - o If the answer to this question is yes, please explain why you harbor those feelings?
7. Have you or someone close to you ever been arrested, convicted of a crime, or spent time in jail or prison?
 - o If yes, how has that experience shaped your view of the criminal justice system?
 - o Do you feel that people who are incarcerated should retain certain rights?
8. Have any of you ever visited or toured a jail, prison, or similar facility? If yes, would your prior visit to a correctional facility cause you to hold any sort of bias in deciding the case at hand?
9. Do any of you harbor ill feeling toward law enforcement officers generally? If the answer to this question is yes, please explain why you harbor those feelings?
10. Do any of you hold any opinions about law enforcement personnel that would prevent you from fairly considering and deciding this case solely on the evidence?

11. Have you ever worked as a lawyer, paralegal, or legal assistant?

- If yes, what area of law did you work in?
- Have you had any cases involving prisoners' rights or constitutional issues?

12. The MDOC Defendants in this case are represented by the Michigan Department of Attorney General. Do any of you harbor ill feelings toward the Michigan Department of Attorney General, and/or State of Michigan employees in general?

- If the answer to this question is yes, please explain why you harbor those feelings?

II. Attitudes Toward Inmates and Prison Conditions

6. Some people believe that when a person is convicted of a crime and sent to prison, they should lose most of their rights. Others believe that prisoners should still have certain legal protections. What are your views?

7. Do you believe prisoners should have access to legal materials and law libraries to help them with their cases?

- Why or why not?

8. The U.S. Constitution protects the right of prisoners to **access courts and legal resources**. Do you have any personal, political, or moral beliefs that would make it difficult for you to apply this legal principle fairly?
9. Do you think prison conditions should be humane and include proper accommodations for prisoners with disabilities?
 - o Why or why not?
10. Have you ever heard of cases where prisoners were denied legal or medical access? If so, what were your thoughts?
11. Do you believe medical staff in prisons should have the authority to **deny prisoners access to legal resources based on medical claims**?
 - Do you think there is a risk of abuse in such decisions?

III. Views on Disability and Medical Treatment

12. Have you or a close family member ever lived with a disability that required accommodations, such as a wheelchair, cane, or other mobility aid?
 - If yes, what has your experience been like in public spaces or institutions?
13. Have you ever encountered accessibility barriers that made it difficult for you or a loved one to move freely?

- Do you believe institutions, including prisons, should be held accountable for **failing to provide proper disability accommodations**?

14. Do you believe that prisoners with disabilities should have the **same rights to accommodations** as people outside of prison?

15. Some people believe medical staff in prisons make decisions that prioritize **security over medical care**. Others believe medical staff have a duty to **ensure proper treatment regardless of security concerns**. What are your thoughts?

16. Do you believe that medical professionals in a prison setting are more likely to **falsely label a prisoner as a risk** in order to deny them access to services?

- Why or why not?

IV. Attitudes Toward the First Amendment and Legal Rights

17. The First Amendment protects free speech and the right to **petition the government**, including a prisoner's right to **access legal resources**.

- Do you believe these rights should still apply to incarcerated individuals?

18. Have you or someone close to you ever had difficulty **accessing legal representation or legal resources**?

- How did that affect your perspective on legal rights?

19. Some people believe that prisoners who file lawsuits or grievances are just **trying to manipulate the system**. Others believe that **prisoners have legitimate concerns that deserve to be heard**. What are your thoughts?

V. Bias Against Certain Types of Offenders

20. This case involves a prisoner who has admitted why he is incarcerated.

Would you be able to set aside any personal biases about **his crime or past criminal history** and focus solely on whether his legal rights were violated?

21. Have you ever been a victim of a **crime**?

- If yes, would this impact your ability to fairly evaluate a case where a prisoner is claiming their rights were violated?

22. Do you have strong personal views on **drunk driving or felony records** that would make it difficult for you to **treat a prisoner fairly in a lawsuit against prison officials**?

23. Do you believe that people who have committed crimes **deserve to suffer while in prison**?

- If yes, do you think that belief would prevent you from being impartial in this case?

24. Have you ever had a **negative encounter with someone who has a felony record**?

- If yes, how do you feel that experience might affect your judgment in this case?

VI. Assessing Bias Against Lawsuits and Compensation

25. Some people believe there are **too many lawsuits** and that prisoners should not be able to **sue the government or medical staff**. Others believe lawsuits are an important way to hold people accountable.

- What are your views?

26. If you find that the prisoner's **constitutional rights were violated**, would you have any difficulty awarding damages?

27. Some people feel uncomfortable **holding government agencies accountable** for wrongdoing. Would you have any hesitation in **ruling against the Michigan Department of Corrections** if the evidence shows they violated the prisoner's rights?

28. Do any of you hold any opinions about courts or lawyers that would prevent you from fairly considering and deciding this case solely on the evidence?

29. Without hearing any evidence, do any of you believe that just because the Plaintiff filed a lawsuit, the Defendants must have done something wrong?
30. Without hearing any evidence, do any of you believe that just because the Plaintiff filed a lawsuit, the Defendants must have done something wrong?
31. If you were in prison and **medical staff falsely labeled you as a self-harm risk** to block your access to a law library, would you feel that your rights had been?
32. Do you believe **prison officials and medical staff should be held accountable** for violating prisoners' rights?
33. Is there any reason—personal, religious, or political—that would prevent you from **fairly evaluating this case** and following the judge's instructions on the law?

Views on Lawsuits Against the Government

34. This case involves a lawsuit against a **state agency (MDOC)** and **medical staff working in a prison.**

- Do you have any **philosophical or personal beliefs** that would make you hesitant to hold government agencies or public employees accountable?

35. Some people believe that **prisoners should not be allowed to sue** because they have already been convicted of a crime. Others believe that everyone deserves legal protections. Where do you stand on this issue?

36. Have you ever had a **negative experience with government agencies, including the prison system, police, or medical facilities**?

37. If yes, would that make it difficult for you to be impartial in this case?

Have you ever had an **interaction with law enforcement, courts, or corrections** that left you feeling:

- That the legal system is fair and just?
- That the legal system is unfair or biased?

38. Have you ever had to file a formal **complaint or lawsuit** against a government agency, employer, or institution?

- If yes, what was the nature of the complaint?
- Do you believe the system treated you fairly?

39. Have you ever been a **witness in a trial or deposition**?

- What was your role?
- How did that experience shape your view of the legal process?

40. Have you ever felt that **your rights or the rights of someone close to you were violated by an institution** (such as a school, government office, employer, or hospital)?

- How did that experience shape your views on accountability?

Views on Disability and Government Responsibility

41. Do you believe the government should be required to make **reasonable accommodations** for people with disabilities in public institutions, including prisons?

42. Have you ever witnessed or experienced **discrimination based on a disability**?

- If yes, how did that affect your view on institutions following disability laws?

43. Do you think that **prisons have a duty to accommodate prisoners with disabilities, even if it requires extra effort or resources?**

44. Have you ever worked with or known someone with **a disability that required mobility assistance?**

- Do you believe it is **reasonable** to expect that **public institutions, including prisons, make accommodations for disabled individuals?**

Views on Medical Care and Authority of Medical Staff

45. Have you ever been in a situation where a **doctor or medical staff member made an incorrect assumption about your medical condition?**

- How did that experience impact your trust in medical professionals?

46. Do you believe that **medical staff in a prison setting should be trusted without question** when making decisions about a prisoner's treatment and access to resources?

47. Have you ever had **a negative experience with a doctor or hospital** where you felt your medical needs were ignored or dismissed?

- Would that experience affect how you evaluate medical staff testimony in this case?

General Questions to Detect Unspoken Bias

48. Some people feel that prisoners should be treated **as harshly as possible** as part of their punishment. Others believe that prisoners should be treated **humanely and in accordance with the law**. Where do you stand on this issue?

49. If a prisoner **complains about their treatment**, do you believe they are more likely to:

- Have a legitimate concern?
- Be exaggerating or trying to manipulate the system?

50. If you had **a strong personal belief that differed from the law**, would you be able to set that belief aside and **apply the law as the judge instructs**?

51. Have you ever had **a negative experience with a person who had a felony record**?

- Would that experience make it difficult for you to be fair in this case?

52. Do you have **any religious, moral, or political beliefs** that would make it difficult for you to be fair and impartial in this case?

IX. Expanded Voir Dire Questions

A. Questions on Fairness and Preconceived Notions

53. Do you believe that people in prison deserve **the same legal protections as people outside of prison**?

- If no, why not?

54. Some people think **prisoners exaggerate their claims of mistreatment** to get sympathy or a legal advantage. Others believe **prisoners' claims should be taken seriously**. What do you think?

55. Do you believe that **prisoners sometimes fabricate complaints about prison staff and medical personnel**?

- If yes, does that belief affect your ability to remain impartial in this case?

56. Do you believe that **certain rights, such as the right to medical care or legal access, should be limited in prison**?

- Why or why not?

B. Questions on Authority and Trust in Prison and Medical Staff

57. Do you believe that **prison medical staff are under pressure to prioritize security over patient care**?

- If so, how do you feel about that?

58. Have you ever had a **personal experience where you or a loved one was denied medical care or accommodations?**

- How did that experience affect your trust in medical professionals?

59. Have you ever known someone who was misdiagnosed or had their **medical condition dismissed by a doctor?**

- If yes, how did that affect your trust in medical providers?

60. If a **prison doctor claims a prisoner is faking their symptoms** and the prisoner claims otherwise, would you tend to believe:

- The doctor, because they are a medical professional?
- The prisoner, because people in institutions often have their medical needs ignored?
- Would you keep an open mind and evaluate all the evidence?

C. Questions About Legal Rights and Access to Courts

61. The First Amendment protects the right to **access legal resources and courts.**

- Do you believe this right should apply to prisoners? Why or why not?

62. If someone **is wrongfully denied the ability to work on their legal case**, do you think they should have the right to **hold officials accountable?**

63. Do you think that **prisoners should be required to represent themselves in legal matters without access to legal resources?**

- Why or why not?

64. Have you ever been involved in a **legal dispute where access to information, a lawyer, or legal materials made a big difference?**

- How did that experience shape your view of legal access?

65. Do you believe that **prisoners should have to prove extreme hardship** before being allowed legal access?

- Why or why not?

D. Questions About Disability and Fair Treatment in Institutions

66. Have you ever seen a **person with a disability struggle due to lack of accommodations?**

- What did you think should have been done differently?

67. If a **public building, workplace, or prison fails to provide necessary accommodations for someone in a wheelchair**, do you think they should be held responsible?

- Why or why not?

68. Have you ever personally **had difficulty accessing public spaces, businesses, or services due to a disability or injury?**

- How did that experience impact your views on accessibility?

69. Some people believe **providing accommodations for disabled individuals is a burden on institutions**. Others believe **accessibility is a basic right**. What do you think?

70. If you were unable to **walk or move freely and were confined to a small, cramped cage for long periods**, how do you think that would affect your physical and mental well-being?

E. Questions About Views on Government and Lawsuits

71. Some people believe that **suing the government is an abuse of the system**, while others believe that **lawsuits are necessary to keep public officials accountable**. What do you think?

72. If the evidence shows that **the prison system violated federal disability laws**, would you have **any hesitation in holding them accountable**?

73. Do you believe that **lawsuits against prisons or medical staff are usually frivolous**?

- Why or why not?

74. Have you ever worked for, or had experience with, a **government agency, prison, or hospital** where lawsuits were a concern?

- How did that experience shape your views?

75. If the judge instructs you that the law requires **prisons to provide reasonable accommodations for disabled inmates**, would you be able to apply that law fairly?

F. Questions About Chronic Pain and Medical Mistreatment

76. Have you or someone close to you ever experienced **chronic pain or a medical condition that was dismissed by doctors?**

- If so, how did that experience shape your views on medical treatment?

77. Do you believe that **chronic pain is sometimes ignored or downplayed by medical professionals?**

- Why do you think that happens?

78. If a person claims they are in **severe pain**, but a doctor disagrees, would you:

- Assume the doctor is right?
- Assume the patient is exaggerating?
- Keep an open mind and look at all the evidence?

79. Do you believe that **prison medical staff are under pressure to minimize complaints about medical conditions?**

- Why or why not?

80. Have you or someone you know ever been **labeled as exaggerating medical symptoms when they were actually in pain?**

- If yes, how did that experience affect your trust in medical professionals?

G. Questions on Personal Bias and Ability to be Impartial

81. If a prisoner **admitted they were in prison for a serious offense**, would that make it harder for you to fairly evaluate their legal claims?

82. If a person in a wheelchair was denied access to a space they had a legal right to enter, would you:

- Feel sympathy but think it's unavoidable?
- Believe the institution should be held accountable?
- Believe it's not the government's responsibility to fix?

83. Do you believe that **medical staff should always be trusted over a patient's word**?

- Why or why not?

84. Have you ever been in a situation where you felt **powerless against an institution or government agency**?

- How did that experience shape your views?

85. Some people feel that **prisoners deserve to suffer because of their crimes**. Others believe that **prisoners still deserve basic rights**. Where do you stand on this issue?

86. If a **person in prison claimed their medical needs were ignored or that they were falsely labeled as a self-harm risk**, would you be more likely to:

- Believe them?
- Doubt their claim?
- Keep an open mind and look at the evidence?

87. Do you have **any personal, religious, or moral beliefs** that would make it difficult for you to be fair in this case?

88. Do you believe that **people with criminal records deserve a second chance?**

- Why or why not?

89. If the evidence in this case shows that the prisoner was **treated unfairly and denied basic rights**, would you be willing to rule in their favor, even if they were convicted of a serious crime?

90. Is there **any reason at all**—even a small one—that you feel you **should not serve on this jury?**

Dated: March 13, 2025,

LIGHTHOUSE LITIGATION, PLLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 4, 2025, I filed this instant motion, electronically filed the above and foregoing NOTICE REGARDING PLAINTIFF'S INABILITY TO MEET MARCH 13, 2025 DEADLINE with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

By: /s/Joshua S. Goodrich
Joshua S. Goodrich, J.D., LL.M. (P83197)